

HALLENE LIETEAU,

Plaintiff,

V.

Civil Action No. 1:04-cv-10967-GAO

WORLDSPAN, LP. AND,
WORLDSPAN TECHNOLOGIES,
INC.

Defendants.

ASSENTED-TO MOTION FOR ADMISSION PRO HAC VICE OF CHAD A. SHULTZ

Defendants, Worldspan, LP. and Worldspan Technologies, Inc., by its counsel, Allison K. Romantz, an attorney at the firm of Morgan, Brown & Joy, LLP, pursuant to Local Rule 83.5.3(b), move the Court to admit Chad A. Shultz, attorney at the law firm of Ford & Harrison LLP, 1275 Peachtree Street, N.E., Suite 600, Atlanta, Georgia 30309, (404) 888-3800 pro hac vice.

In support of this motion, defendants state:

1. Mr. Shultz is presently been admitted to practice before the courts of the States of Georgia. His admission has been and is in good standing. Mr. Shultz is also admitted to the following courts:

| Court | Date Admitted |
|--|---------------|
| United States District Court Northern District of Georgia Middle District of Georgia | 1990 1992 |
| Georgia Court of Appeals | 12/89 |
| Georgia Supreme Court | 12/89 |
| U.S. Supreme Court | 7/17/98 |

A certificate of good standing for the United States District Court for the Northern District of Georgia is attached as Exhibit A.

- 2. Mr. Shultz understands that he is charged with knowing and complying with the Local Rules of this Court. He has never been disciplined by any Court for any reason. There are no pending disciplinary proceedings against Mr. Shultz.
- 3. An Affidavit by Mr. Shultz certifying the information about himself contained in this motion is attached hereto as Exhibit B.
- 4. Allison K. Romantz, an attorney with the firm Morgan, Brown & Joy, LLP, One Boston Place, Boston, MA 02108, (617) 623-6666, and a member of the bar of this Court, supports this application and shall also appear on behalf of the defendants. Ms. Romantz and her firm will receive service of pleadings,

documents and communications from plaintiff's counsel and the Court on behalf of defendants.

- 5. Counsel for plaintiff assents to allowance of this motion.
- 6. Enclosed with this motion is the check in the appropriate amount, as required by Appendix A to Local Rule 4.5.

WHEREAS, Defendants respectfully move the Court to grant the Motion and admit Chad Shultz to appear in this matter *pro hac vice*.

Respectfully submitted,

MORGAN, BROWN & JOY LLP One Boston Place Boston, Massachusetts 02108 (617) 523-6666

Allison K. Romantz (BBO #554909)

Dated:

September 5, 2004

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served upon counsel for plaintiff, Jonathan Feigenbaum, Esq., Phillips & Angley, One Bowdoin Square, Boston, MA 02114, by facsimile and first-class U.S. mail this day of September 2004.

Atlanta:351930.1

EXHIBIT "A"



CERTIFICATE OF GOOD STANDING

| UNITED STATES OF AMERICA | } |
|------------------------------|------------|
| NORTHERN DISTRICT OF GEORGIA | } ss. } |

I, Luther D. Thomas, Clerk of the United States District Court for the Northern District of Georgia,

DO HEREBY CERTIFYthat CHAD ALLAN SHCULTZ, State Bar No. 644440, was duly admitted to practice in said Court on May 16, 1990, and is in good standing as a member of the bar of said Court.

Dated at Atlanta, Georgia, this 3rd day of September, 2004.

LUTHER D. THOMAS **CLERK OF COURT**

By:

S Perez Deputy Clerk

EXHIBIT "B"

| UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS EASTERN DIVISION | |
|---|----------------------------|
| Hallene Lieteau, | |
| Plaintiff, | COUNTY HASS. |
| v. | |
| Worldspan, L.P. and Worldspan Technologies, Inc., | CASE NO. 1:04-cv-10967-GAO |
| Defendants. | |
| AFFIDAVIT OF CHAD A. SHULTZ FO | R ADMISSION PRO HAC VICE |
| State of Georgia | |

CHAD A. SHULTZ, being duly sworn, hereby deposes and says as follows:

I am a partner with the law firm of Ford & Harrison LLP. 1.

SS:

)

County of Fulton

- 2. I submit this affidavit in support of my motion for admission to practice pro hac vice in the above-captioned matter.
- 3. As shown in the Certificate of Good Standing annexed hereto I am a member in good standing of the United States District Court for the Northern District of Georgia.
- There are no pending disciplinary proceedings against me in any State or Federal 4. court.
- Wherefore your affiant respectfully submits that he be permitted to appear as 5. counsel and advocate pro hac vice in this one case.

Respectfully submitted,

CHAD A SHULTZ

GEORGIA BAR NO. 644440

FORD & HARRISON LLP

1275 PEACHTREE STREET, N.E., SUITE 600

ATLANTA, GA 30309 PHONE: (404) 888-3800 FAX: (404) 888-3863

Attorneys for Defendants

Sworn to and subscribed this <u>10</u>day of September, 2004.

Notary Public

My Commission Expires:
My Commission Expires April 1, 2006

Atlanta:351927.1